



UNION CARBIDE CORPORATION

P.O. BOX 180, SISTERSVILLE, WEST VIRGINIA 26175

Specialty Chemicals Division

SILICONES PLANT

November 7, 1988

MEMORANDUM TO: F. E. Dailey

COPY TO: R. E. Tuttle

SUBJECT: Propose TSCA-PCB Regulations

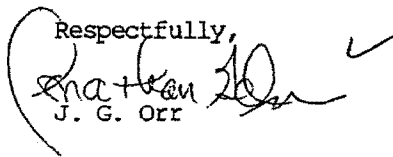
Fred,

Listed below is the impact of the new PCB regulations on our PCB storage and off-site disposal. Please note that these regulations are currently out for public comment period. The Final Rule probably won't be due until early 1989.

1. Additional Information on PCB Annual Report (July 1)  
I will adjust our annual report form to include requirements of the Final Rule. No problem in gathering additional information.
2. Notifying EPA of PCB Generator EPA I.D. Number  
Final Rule will have availability statement for Form 7710-53. We will submit our EPA ID number on the form and return it to EPA within 60 days of Final Rule Date.
3. A Uniform Manifest will Accompany All Shipments of PCB Wastes
  - a) Advance copy will be submitted to disposer.
  - b) Dates of "removal from service" will be listed on manifest.
  - c) Specific state manifests can be used, but we have Uniform Manifest on hand.

Generally, the new revisions in the regulations impact us lightly because we have less than 50 capacitors remaining in service and we already include most of newly required information on manifest and annual reports. We currently have no PCB wastes in storage. I will keep a copy of the proposed rules in the L.E.I.

Respectfully,

  
J. G. Orr

JGQ:slc  
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